

**EXHIBIT AC**

**Amy Sanchez**

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# REDACTED

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**From:** Shifrin, Maximillian S. [mailto:mshifrin@bakerlaw.com]  
**Sent:** Wednesday, September 12, 2018 12:20 PM  
**To:** Agatha Cole <acole@chaitmanllp.com>  
**Cc:** Helen Chaitman <hchaitman@chaitmanllp.com>  
**Subject:** RE: Third Party Productions Not in E-Data Room

Agatha,

You seem to be under a misimpression about what should be in E-Data Room 1. The Data Room does not contain all third-party documents in the Trustee's possession, and we have never suggested otherwise. As we've stated multiple times, the primary purpose of E-Data Room 1 is to make available the materials relating to BLMIS's fraud and insolvency that were considered by the Trustee's experts in connection with their reports. Accordingly, the third-party records considered by our experts are in E-Data Room 1, including some documents from the entities listed on your chart.

While many of the third-party documents are generally not relevant to the good faith cases, we have nevertheless searched them for you using agreed-upon search terms, and also recently produced all documents that were produced to the Trustee by the SEC. If you are interested in additional third-party documents, please let me know what those are specifically.

With respect to the saved search functionality in E-Data Room 1, please let us know if you have a suggested modification. Our staff worked closely with the creators and owner of Relativity when E-Data Room 1 was created years ago, and we decided that this was the only way to ensure that users didn't inadvertently share their searches with other firms. If you'd like, we can set up a call with Nicole Tineo, our Litigation Support Manager, to discuss this in greater detail or test any suggestions you might have.

As an alternative, we are willing to make a conventional production of all the documents in E-Data Room 1 so that you can load them into your own platform without any restrictions.

Please let me know.

Max

**From:** Agatha Cole <[acole@chaitmanllp.com](mailto:acole@chaitmanllp.com)>  
**Sent:** Tuesday, September 11, 2018 5:52 PM  
**To:** Shifrin, Maximillian S. <[mshifrin@bakerlaw.com](mailto:mshifrin@bakerlaw.com)>  
**Cc:** Helen Chaitman <[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)>  
**Subject:** Third Party Productions Not in E-Data Room

Hi Max,

I am writing to follow up on two very important and urgent issues:

- (1) First, I've attached a list of document sets that were identified in your index to the third-party productions but have not yet been produced to us or made available in the Trustee's E-Data Room. Could you please have these uploaded to the E-Data Room for our immediate review?
- (2) Relatedly, we would like to reiterate our concerns about the current access restrictions that prevent us from using Relativity's saved search functionalities in the E-Data Room. These restrictions are unnecessarily burdensome and make it exceedingly difficult to use the E-Data Room as intended. I am hopeful that we can figure out a mutually agreeable solution to this problem. Please let me know if we are truly at cross-roads, however, so that we can raise this with the court, if necessary.

Thank you in advance for your prompt attention to these matters.

Best,

Agatha

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